

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JOHN DOE-1 and JANE DOE-2, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

LEXISNEXIS RISK SOLUTIONS INC.,  
RICHARD ROES 1-10, fictitious names of unknown individuals and ABC COMPANIES 1-10, fictitious names of unknown entities,

Defendants.

Civil Action No. 1:24-cv-04566  
Honorable Harvey Bartle, III, U.S.D.J.

**NOTICE OF MOTION  
TO DISMISS PLAINTIFFS' SECOND  
AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that on Monday, April 7, 2025, or as soon thereafter as counsel may be heard, Defendant LexisNexis Risk Solutions Inc. ("LexisNexis"), by and through its undersigned attorneys, will move before the Honorable Harvey Bartle, III, U.S.D.J. in the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101, for entry of an Order granting LexisNexis' Motion to Dismiss Plaintiffs' Second Amended Complaint for lack of subject-matter jurisdiction and failure to state a claim pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

**PLEASE TAKE FURTHER NOTICE** that LexisNexis will rely upon its Brief submitted herewith in support of this application.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested if an opposition is filed.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

Respectfully submitted,

**LOWENSTEIN SANDLER LLP**  
Attorneys for Defendant LexisNexis Risk Solutions Inc.

Dated: March 6, 2025

By: /s/ A. Matthew Boxer

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